REMARKS

Claims 1 - 10 remain active in this application. The indication of allowability of claim 2 is again noted with appreciation. No amendments have been made and no new matter has been introduced into the application.

Claims 1 and 3 - 10 have again been rejected under 35 U.S.C. §103 as being unpatentable over Heath et al. in view of Baum et al or Heath et al in view of Appleford. This ground of rejection is respectfully traversed for the reasons of record which are hereby fully incorporated by reference and the further remarks appended below.

As previously pointed out, the invention is directed to a method for making modification in an interface to an operational computer system, particularly during the development thereof, and is particularly advantageous for applications and environments where the operation of that computer system is particularly expensive such as when it is used for control of a machine or system which is, itself, expensive to operate and/or where the distraction of an operator in the course of making modifications of the interface must be avoided. The invention also provides for avoiding incompatibility or inconsistency between a simulator and the operational system during the useful lifetime of the operational system during which it could be subjected to many modifications and also provides a desk-top simulator which may be kept fully updated with system changes. See, for example, page 3, line 24, to page 4, line 17. These meritorious effects are provided by the claimed steps of loading tables defining an interface from the operational system into a different computer system, simulating the interface with that different computer system, during which modifications to the interface can

be made which are reflected in modifications to the tables defining the interface, and reloading the tables, so modified, back into the operational system to effect the modifications to the interface in the operational system. Thus the basic concept of the invention is the transfer of tables defining the interface back and forth between an operational system and a simulator for simulating that operational system. It is respectfully submitted that this concept is not addressed by the Heath et al. and Baum et al. or Appleford references relied upon by the Examiner.

Heath et al., as previously pointed out, is directed to inverting the usual order of development of an application and a user interface thereto. As explicitly disclosed at column 2, lines 42 - 58, Heath indicates that the operation of a computer program is simulated "by designing the external interfaces of the simulated program and to connect the interfaces according to the design of the simulated program ... by connecting them with logic" and that "[n]o program code is required at this stage". Heath et al. further indicates in this passage that if the program is already fully or partially coded, changes would be made to the *program code*. In any case, during *simulator* design, "all information supplied by the user is stored in memory used by [application simulator] AS to run a simulation. For instance, when a user is describing a screen, he types information on the display exactly the way he wants the screen to look. After he saves the screen, AS takes the information on the display and converts it into a table. If the user wants to see the screen again, AS will convert the table back into a screen image." (See column 4, lines 55 - 64.) Even the paragraph bridging columns 6 and 7 contains no mention of transferring tables defining the interface back and forth between an operational computer system and another computer providing simulation. Therefore,

Heath et al. does not appear to address even the basic concept underlying the present invention, as claimed, and, but for the mention of the possibility of the program being coded or partially coded, as noted above, appears to assume throughout that an operational system including an interface is not available and is to be developed through simulation of the interfaces and logical connection thereof.

This very basic deficiency of Heath et al. is not mitigated by Baum et al. or Appleford and the Examiner has not asserted that it is. In regard to the combination with Baum et al., the Examiner admits that Heath et al does not disclose providing an input to a computing device other than the computing device providing the interface (thus basically reading the computing device providing the interface *as the simulator*) and relying on the remote console of Baum et al. for providing such an input. However, this construction of the references does not address the entirety of thee claim recitation: "providing, *as an input* to a *computing device other than a computing device providing said operator system interface*, definitional tables for said operator system interface". The remote console of Baum et al. is just that: a console from which an input can be provided to an opthalmic surgical system but is not a computing device providing an interface and the data input is not definitional tables for defining attributes of an interface and the opthalmic surgical system is not a computing device other than the computing device providing the interface nor is it a simulator on which the interface can be simulated in accordance with definitional tables. Thus the Examiner clearly has not made and cannot make a *prima facie* demonstration of obviousness based on Heath et al and Baum et al.

In regard to Appleford, the Examiner makes essentially the same admission; failing to address the

information which is input, the identity of the operational system and the simulator and the like; asserting that Appleford teaches the claimed input step in an avionics environment. However, Appleford, in fact, is directed to configuring an aircraft instrument without the use of configuration pins and providing protection against unauthorized reconfiguration thereof in regard to such interchangeable parameters as CAA or FAA flight rules and the units of measurement read-outs. In Appleford, there is no computing device other that the computing device providing the interface and no simulator, much less the transfer of definitional tables between computing devices. Therefore, as with Baum et al. the Examiner has not made and cannot make a *prima facie* demonstration of obviousness of any claim based on a combination of Heath et al. and Appleford.

Thus it is clearly seen that the asserted grounds of rejection based or Heath et al and Baum et al. or Appleford are clearly in error and untenable. The references applied do not teach or suggest the subject matter attributed to them by the Examiner and do not answer the explicit recitations of the claims and even fail to address the basic concept of the invention. Accordingly, reconsideration and withdrawal of these grounds of rejection are respectfully requested.

Claim 1 has also been rejected under 35 U.S.C. §103 as being unpatentable over Lata et al. in view of Tzidon et al. This ground of rejection is also respectfully traversed.

Lata et al. teaches a keyboard with programmable legends corresponding to respective functions. The legends for the array of keys is organized as a page and pages are arranged in a hierarchical order so that a key of one page may be used to make one of a plurality of other pages active and a key of that page may be used to select another page and so on as illustrated in Figure 4. the legends and keyboard can

be reconfigured so that no legend or next page access is applied to an inactive key. Perhaps the most relevant portion of Lata et al. is column 5, lines 15 - 24 in which it is indicated that the keyboard and legend configurations are defined in a data base which may be created by a host system and then downloaded to the keyboard processor or, in an environment where there is no host system, the database is created, modified and stored entirely within the keyboard processor and that, in either case, the key configurations are modified by editing the database. Nevertheless, the keyboard processor and the host system, if provided, are of the same system, as shown in Figure 1 and this passage of Lata et al. can only be construed as transferring data between two systems through impermissible hindsight and even then it does not appear that the database is modified responsive to changes made in the interface, as claimed.

However, it is unclear if the Examiner has made such a construction of Lata et al. since (after referring to a simulator in the discussion of Lata et al., the Examiner admits that Lata et al. does not teach a simulator and relies on Tzidon et al. for teaching a simulator and asserts without explanation or line of reasoning that it would be obvious to use the simulator of Tzidon et al. with the system of Lata et al. It is respectfully submitted that such a superficial combination of prior art (e.g. using one reference for an operational system and another reference for a simulator) falls far short of making a *prima facie* demonstration of obviousness and, in fact, provides no evidence whatsoever in regard to the obviousness of transferring definitional tables defining an interface back and forth between an operational system and a simulator by which changes are effected in the interface and corresponding changes made in the definitional tables. Such a baseless

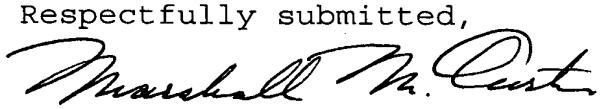
application of the prior art also evidences the application of hindsight and fails to consider the claimed subject matter as a whole insofar as it merely asserts obviousness of combining independent systems at the point where the invention provides cooperation of those systems and, in any event, fails to answer the recitations of the claims in regard to modifying definitional tables based on changes made in the simulated interface.

Accordingly, it is clear that this new ground of rejection is clearly in error and without basis in the prior art applied. Therefore reconsideration and withdrawal thereof are respectfully requested.

Since all rejections, objections and requirements contained in the outstanding official action have been fully answered and shown to be in error and/or inapplicable to the present claims, it is respectfully submitted that reconsideration is now in order under the provisions of 37 C.F.R. §1.111(b) and such reconsideration is respectfully requested. Upon reconsideration, it is also respectfully submitted that this application is in condition for allowance and such action is therefore respectfully requested.

If an extension of time is required for this response to be considered as being timely filed, a conditional petition is hereby made for such extension of time. Please charge any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041.

Respectfully submitted,



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